

REVERE

COPPER AND BRASS INCORPORATED

March 19, 1985

EPA Region 5 Records Ctr.



315349



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Mr. Glenn D. Savage, Jr.
LFOS - DLPC
Illinois EPA
4500 S. Sixth Street
Springfield, IL 62706

Ref: LPC #0390050004 - DeWitt County
Clinton/Revere Copper and Brass Incorporated
ILD #005078274

Dear Mr. Savage,

This letter is a follow-up to our discussion of 3/6/85 at the Agency's office in Springfield concerning the covering of Revere's F006 industrial wastewater treatment plant sludge filter cake containers by strict application of 35 IL A.C. 725.273(a) and (b).

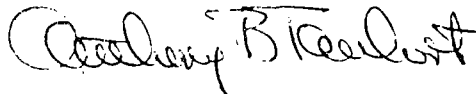
1. Revere accumulates its sludge filter cake in welded steel containers capable of accepting 60 cubic feet of material per container. At a calculated sludge density of 12.9 lbs/gallon, each container, when full, weighs approximately 5800 pounds.
2. The clay-like consistency of Revere's sludge filter cake makes clean-up a simple matter of sweeping and shoveling the material back into the container in the extremely unlikely event that a spill should occur.
3. Revere accumulates its sludge containers in preparation for disposal inside a totally enclosed, weather protected, concrete floored building that previously contained Revere's copper tube manufacturing facility. There is extremely little likelihood that the clay-like filter cake could ever escape from this accumulation area to the external environment.
4. Accumulation of the sludge filter cake in open-topped containers promotes further drying of the material by evaporation of residual entrained moisture. This results in reduced product weight and therefore reduced transportation and disposal costs for Revere at no detriment to the environment.

This confirms our understanding, in light of the above facts, that the Agency will not require Revere's sludge filter cake

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containers to be covered in accordance with Subpart I of 35 IL A.C. during that time when the filter cake material is being accumulated for disposal.

Sincerely,

A handwritten signature in cursive script, appearing to read "Anthony B. Taubert".

Anthony B. Taubert
Chief Chemist

cc: S. H. Kaprelian
M. A. Bingaman
E. T. Cunningham
D. A. Jackson
file